

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 31, 2012.

Permit Number: **R30-03900049-2012**
Application Received: **February 6, 2015**
Plant Identification Number: **03900049**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Coco Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, S.E.**
Charleston, WV 25314

Permit Action Number: *SM01* Revised: *August 18, 2015*

Physical Location:	Elkview, Kanawha County, West Virginia
UTM Coordinates:	463.6 km Easting • 4250.3 km Northing • Zone 17
Directions:	Traveling from the intersection of State Route 114 and secondary route 49, proceed 3.4 miles and bear right on Route 49. Go 3.6 miles from the intersection of Routes 47 and 49 and turn left onto secondary County Route 7/1 (Coco Road). Travel approximately 1.5 miles, the station is located on the right side of the road.

Facility Description

The Coco Station is a natural gas storage facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station currently consists of five (5) 880-hp, one (1) 1,100-hp and one (1) 4,000-hp natural gas fired reciprocating engines, one (1) 275-hp and one (1) 306-hp emergency generators, one (1) heating system boiler, two (2) heaters, and numerous storage tanks of various sizes. This modification incorporates the changes made in R13-2087E to retire the 275-hp (G1) and 306-hp (G2) Ingersoll-Rand PVG-6 emergency generators currently located at the facility and replace them with one 1,175-hp (G3) Waukesha VGF-P48GL emergency generator.

Emissions Summary

The change in potential emissions associated with the significant modification (SM01) is as follows:

Pollutants	Change in Potential Emissions, TPY
CO	-4.89
NO _x	-2.11
PM ₁₀	-0.01
SO ₂	0.001
VOC	-0.02
Formaldehyde	0.09
Total HAP	0.11

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants (CO and NO_x) and over 10 tons per year of a single hazardous air pollutant (HAP). Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Columbia Gas Transmission Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR16	Standards of Performance for New Stationary Sources
	45CSR30	Operating permit requirement.
	45 CSR 34	Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40CFR Part 63
	40CFR63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines
	40CFR60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE)
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2087E	June 16, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes from R13-2087E have been incorporated in the Title V permit. These changes include the following:

- The 275-hp (G1) and 306-hp (G2) Ingersoll-Rand PVG-6 emergency generators are to be disconnected and retired from service before the new emergency generator/engine (Waukesha VGF-P48GL (G3)) can be put into service per condition 5.1.1 of R13-2087E.
- One 1,175-hp (G3) Waukesha VGF-P48GL emergency generator has been added to the Emission Unit Table. The proposed engine will be subject to 40CFR60 Subpart JJJJ limits for emergency engines greater than 130 hp. Since the engine will not be a certified engine, performance testing per 40 CFR §60.4244 will be conducted initially and subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. The engine will also be subject to limited requirements under 40 CFR 63, Subpart ZZZZ. The engine is classified as a new stationary engine greater than 500hp located at a major source of HAP. The company will comply with subpart ZZZZ by submitting the initial notification per 40 CFR §63.6645(f) and meeting the requirements of 40 CFR §63.6640(f). The requirements for the emergency generator have been added in sections 5, 6(40CFR60 Subpart JJJJ) and 7(40CFR63 Subpart ZZZZ) of R13-2087E.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45CSR4 shall not apply to the following sources of objectionable odor until such time as feasible control methods are developed: Internal combustion engines.
[45CSR§4-7.1 State-Enforceable only.]
- b. 40 C.F.R. 64 – No emission units have any add-on control; therefore, in accordance with 40 C.F.R. §64.2(a), CAM is not applicable to this facility.
- c. 40 C.F.R. 60 Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* – There are no compression ignition engines at the facility.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Friday, July 3, 2015
Ending Date: Monday, August 3, 2015

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

None